

COUNCIL OF CHIEF STATE SCHOOL OFFICERS

One Massachusetts Avenue, NW, Suite 700, Washington, DC 20001-1431 • 202/408-5505 • FAX 202/408-8072

RECEIVED RECEIVED

DOCKET FILE COPY ORIGINAL

PEDERAL COMMUNICATIONS COMMISSION

OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas Secretary Federal Communications Commission The Portals, 445 Twelfth Street, SW Washington, DC 20554

SUBJECT: EXTENSION OF DEADLINE FOR USE OF FUNDS IN PROGRAM
YEAR 2, UNIVERSAL SERVICE "E-RATE" PROGRAM - (CC
DOCKET NO. 96-45)

Dear Ms. Salas:

The Council of Chief State School Officers is filing this letter in support of the appeal from the State of Illinois urging the Federal Communications Commission to extend the time frame that schools and libraries have to complete nonrecurring, internal connections support under the universal services program for this fiscal year.

In our letter to your office on January 7, 2000, we also urged the Commission to adjust the schedule for completing non-recurring services in year two of the universal services discounts for schools and libraries. We indicated: "the period of time for completing of approved projects for internal connections under second year funding be extended from June 30, 2000 to September 30, 2000. The experience of year one suggests that many districts cannot initiate internal connections projects during the school day and school year."

We reiterate the position earlier recommended and express our full support for the recent appeal from Glenn W. McGee, Illinois State Superintendent of Education, dated January 24, 2000. His letter requested an extension of the date for internal connections discounts and included a justification based on actual problems encountered by four public and private school applicants in the State of Illinois.

No. of Cooles rec'd Of List ABCDE

President NANCY KEENAN, Montana Superintendent of Public Instruction • President Elect PETER MCWALTERS, Rhode Island Commissioner of Education • Vice President ROBERT E. BARTMAN, Missouri Commissioner of Education • Directors JUDY CATCHPOLE, Wyoming Superintendent of Public Instruction • DOUGLAS D. CHRISTENSEN, Nebraska Commissioner of Education • MARY L. PETERSON, Nevada Superintendent of Public Instruction • SUELLEN K. REED, Indiana Superintendent of Public Instruction • TED STILWILL, Iowa Director of Education • MICHAEL E. WARD, North Carolina Superintendent of Public Instruction • Executive Director GORDON M. AMBACH

Our support for the request originating from the State of Illinois is based on our polling representatives of a group of twenty-two states who participate in conference calls with our office on a regular basis. A consensus of the states' technology coordinators, whom we queried on this matter on a recent conference call, indicated that an extension of the deadline for completing internal connections commitments - from June 30, 2000 to September 30, 2000 - would be enormously helpful to their schools. Their personal knowledge of local school requirements, combined with the specific case studies cited in the Illinois appeal, should convince the Commission that the current deadline creates serious logistical and practical problems for completing internal classroom wiring projects while schools are in session. We should note that the June 30th deadline is particularly burdensome for rural schools which rely on small contractors that, typically, do not have sufficient manpower to meet the pressing schedules of multiple customers at peak work times.

In closing, we express our appreciation for the commitment of the Chairman and work by the Common Carrier Bureau to ensure the successful implementation of this program. A timely and sensible resolution of the problem associated with wiring school classrooms during the school-year will contribute immeasurably to strengthening the operation and ultimate success of this program.

Sincerely,

Gordon M. Ambach Executive Director Copies of the foregoing letter have been sent via messenger and/or first-class mail to the parties below:

William E. Kennard Chairman Federal Communications Commission The Portals, 445 Twelfth St., SW Washington, DC 20554

Harold Furchgott-Roth Commissioner Federal Communications Commission The Portals, 445 Twelfth St., SW Washington, DC 20554

Michael K. Powell Commissioner Federal Communications Commission The Portals, 445 Twelfth St., SW Washington, DC 20554

Gloria Tristani Commissioner Federal Communications Commission The Portals, 445 Twelfth St., SW Washington, DC 20554

Susan Ness Commissioner Federal Communications Commission The Portals, 445 Twelfth St., SW Washington, DC 20554

Lawrence E. Strickling, Chief Common Carrier Bureau Federal Communications Commission The Portals, 445 Twelfth St., SW Washington, DC 20554 Elizabeth Valinoti Accounting Policy Division Common Carrier Bureau Federal Communications Commission The Portals, 445 Twelfth St., SW Washington, DC 20554

Irene Flannery, Chief Accounting Policy Division Common Carrier Bureau Federal Communications Commission The Portals, 445 Twelfth St., SW Washington, DC 20554

Kate Moore President Schools and Libraries Division, USAC 2120 L Street, NW Suite 600 Washington, DC 20037

Cheryl Parrino, CEO
Universal Service
Administrative Company
2120 L Street, NW Suite 600
Washington, DC 20037